

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08 - 212
v.	:	DATE FILED: April 10, 2008
ISSA BAH	:	VIOLATIONS:
	:	18 U.S.C. § 1546(a) (possession of
	:	fraudulent immigration document – 1
	:	count)
	:	18 U.S.C. 1028(a)(4) (possession of
	:	fraudulent identification document – 1
	:	count)
	:	18 U.S.C. § 1001(a)(2) (false statement –
	:	1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 17, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

ISSA BAH

knowingly uttered, used, attempted to use, and possessed a document required for entry into or as evidence of authorized stay or employment in the United States, that is, a false and fraudulently procured Refugee Travel Document, issued on or about June 11, 2007 in the name of another, A.B., bearing defendant BAH's photograph, which defendant BAH knew to be procured by means of a false claim and statement and otherwise procured by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ISSA BAH

knowingly possessed an identification document other than one issued lawfully for his use, that is, a Refugee Travel Document, issued on or about June 11, 2007 in the name of another, A.B., bearing defendant BAH's photograph, with the intent that such document be used to defraud the United States.

In violation of Title 18, United States Code, Section 1028(a)(4).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ISSA BAH

in a matter within the jurisdiction of the Department of Homeland Security, an agency of the executive branch of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in that defendant BAH represented that his name was A.B., and his date of birth was on a date in 1967, in a Customs Declaration “Form OMB No. 1651-0009,” and provided that document to a Customs and Border Protection officer at the Philadelphia International Airport as he attempted to enter the United States, when, as the defendant knew, his true and correct name was Issa Bah and his date of birth was on a date in 1965.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney